

## REMARKS

### I. INTRODUCTION

In response to the Office Action dated October 12, 2007, claims 1, 6, 11, 12 and 14 have been amended. Claims 1-14 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. PRIOR ART REJECTIONS

#### A. The Office Action Rejections

On pages (2)-(3) of the Office Action, claims 12 and 14 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,131,809 (Drescher). On pages (3)-(6) of the Office Action, claims 1-3, 6-8 and 13 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch). On pages (6)-(7) of the Office Action, claims 4-5 and 9-10 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch) and U.S. Patent No. 6,131,809 (Drescher). On pages (7)-(8) of the Office Action, claim 11 was rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch) and U.S. Patent No. 6,131,809 (Drescher).

Applicants' attorney respectfully traverses these rejections.

#### B. The Drescher Reference

Drescher describes an automated banking machine (10) that identifies and stores documents such as currency bills deposited by a user. The machine then selectively recovers documents from storage and dispenses them to other users. The machine includes a central transport (70) wherein documents deposited in a stack are unstacked, oriented and identified. Such documents are then routed to storage areas in recycling canisters (92, 94, 96, 98). When a user subsequently requests a dispense, documents stored in the storage areas are selectively picked therefrom and delivered to the user through an input/output area (50) of the machine. The control system (30) for the machine includes a terminal processor (548). The terminal processor communicates with a module processor (552). The module processor (552) communicates with module controllers (554, 556, 558, 560, 562 and 564) which control the operation of devices.

The module processor coordinates the activities of the module controllers to achieve the processing of documents reliably and at high speeds. A special protocol is used to communicate messages between the module processors and module controllers which provides increased reliability.

C. The Graef Reference

Graef describes an automated banking machine (10) including sheet dispensing mechanisms (34, 36, 38, 40). Each sheet dispensing mechanism includes a picking member (72). The picking member rotates, with each rotation generally causing one sheet to be picked from a stack (42) of sheets. The picking member includes movable engaging portions supported on arcuate segments (128, 144). The engaging portions move radially outward to apply additional moving force to an end note bound in the stack responsive to movement of the picking member exceeding the movement of the end note. Sheets are carried in the machine by a transport (54) including a plurality of belt flights (174, 176, 178). Sheets are carried between the belt flights and projecting member portions (180, 182). At least one of the belt flights includes a plurality of longitudinally spaced projections (194, 200, 204, 207) on a sheet engaging surface thereof. The projections provide improved engagement with sheets moving in the transport enabling more reliable movement of sheets.

D. The Lynch Reference

Lynch describes a belt displacement operation periodically carried by the pick mechanism 11 of a sheet feeding apparatus, when the number of sheets fed has reaches a predetermined value. The motor 34 is driven in reverse for a predetermined time, so as to cause rotation of the belt 28 in the opposite direction to that during feeding. Since the pick pulley 26 is supported on the shaft 38 by means of a one-way clutch 40 so that it does not rotate during the reverse rotation of the belt 28, displacement of the belt 28 occurs relative to the pick pulley 26, so that in subsequent pick operations, a different portion of the belt 28 engages the stack 18 so as to pick a sheet, than had displacement of the belt 28 not occurred. This reduces the risk of localized portions of the belt 28 becoming more worn than others, due to more frequent engagement with the stack 18.

E. The Applicants' Invention is Patentable Over the References

1. The rejection of claims 12 and 14 under 35 U.S.C. §102(e) as being anticipated by Drescher

Applicants' independent claim 12 distinguishes over Drescher because it recites a media module for use in a self-service terminal, the media module comprising: (a) means defining a media transport path; (b) a plurality of separate media containers disposed within the media module; and (c) each media container within the media module having a lower face and a separate friction pick mechanism adjacent the media container's lower face for picking media from the media container and transferring the picked media to the media dispense path for transporting the picked media from the media module.

Similarly, Applicants' independent claim 14 distinguishes over Drescher because it recites a method of dispensing media from a self-service terminal, the method comprising the steps of: (a) selectively removing media from one of a plurality of media containers disposed within a media module, wherein each of the media containers within the media module include a friction pick mechanism associated with each media container for picking media from the media container and transferring the picked media to a media dispense path for removing the picked media from the media module; and (b) presenting the removed media to a user.

The Office Action, on the other hand, states that Applicants' claims 12 and 14 are anticipated by Drescher.

Applicants' attorney disagrees.

For example, consider the storage areas labeled as 100, 102, 104 and 106 of canister 94 as shown in FIG. 1 of Drescher:

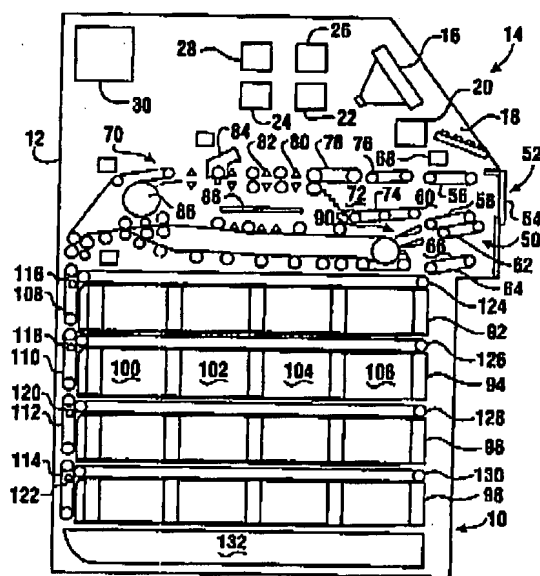
Drescher's FIG. 1

**U.S. Patent**

**Ocl. 17, 2000**

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**6,131,809**



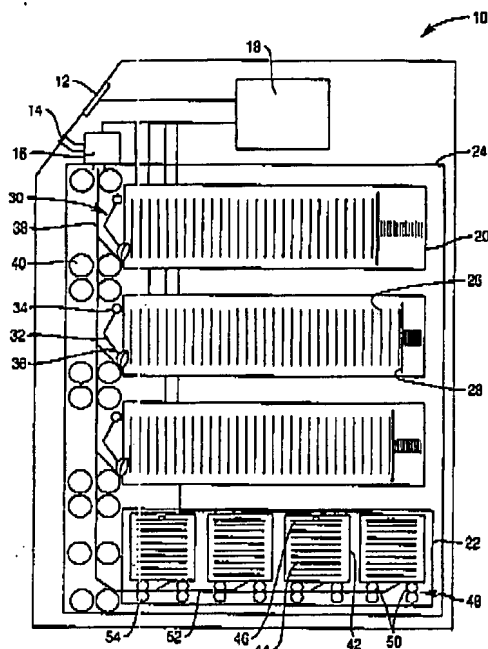
**FIG. 1**

Contrast this to media module 22 of Applicants' FIG. 1, which contains a plurality of separate media containers 42, each media container 42 within the media module 22 having a lower face and a separate friction pick mechanism 48 adjacent the media container's 42 lower face for picking media from the media container 42.

Applicants' FIG. 1

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Drescher shows separate storage areas 100, 102, 104 and 106 within a canister 94, but these are not separate media containers within a media module, as recited in Applicants' claims.

Because the storage areas 100, 102, 104 and 106 of Drescher are not separate containers, they do not have lower faces adjacent the associated separate pick mechanism. Instead, all of the storage areas 100, 102, 104 and 106 of Drescher share a common canister delivery transport 126, which is placed above the storage areas 100, 102, 104 and 106.

Thus, Applicants' attorney submits that independent claims 12 and 14 are allowable over Drescher. Further, dependent claim 13 is submitted to be allowable over Drescher in the same manner, because it is dependent on independent claim 12, and thus contains all the limitations of independent claim 12. In addition, dependent claim 13 recites additional novel elements not shown by Drescher.

2. The rejection of claims 1-3, 6-8 and 13 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef and Lynch

Applicants' independent claim 1 discloses a self-service terminal comprising: a plurality of separate media modules, each media module being operatively associated with a separate pick mechanism for picking media from the media module and transferring the picked media to a media dispense path, at least one of the media modules being associated with a separate vacuum pick mechanism, and at least one other of the media modules being associated with a separate friction pick mechanism.

Applicants' independent claim 6 discloses a self-service terminal comprising: means defining a media dispense path; and a plurality of separate media modules, each media module being operatively associated with a separate pick mechanism for picking media from the media module and transferring picked media to the media dispense path, at least one of the media modules being associated with a separate vacuum pick mechanism and at least one other of the media modules being associated with a separate friction pick mechanism.

The Office Action admits Graef does not teach the elements of claims 1 and 6 directed to at least one module being associated with a vacuum pick mechanism. However, the Office Action, states that Lynch teaches that sheet feeding apparatus "are commonly of either the vacuum pick or friction pick type." Thus, the Office Action asserts that it would have been obvious to include the teachings of Lynch to the disclosure of Graef so that an ATM containing multiple media types can distribute the different types of media types in the most efficient and practical way possible.

Applicants' attorney disagrees with this analysis and asserts that Applicants' independent claims 1 and 6 are not rendered obvious by the references.

Specifically, the combination of Graef and Lynch do not teach or suggest a self-service terminal having a plurality of separate media modules, wherein each media module is operatively associated with a separate pick mechanism, such that at least one of the media modules is associated with a separate vacuum pick mechanism, and at least one other of the media modules is associated with a separate friction pick mechanism.

In the prior art, a self service terminal will employ only one type of pick mechanism. Lynch confirms this by teaching that sheet feeding apparatus may be either a vacuum type or a

friction type, not both a vacuum type and a friction type. Specifically, nowhere does the prior art teach that each media module is operatively associated with a separate pick mechanism, wherein at least one of the media modules is associated with a separate vacuum pick mechanism, and at least one other of the media modules is associated with a separate friction pick mechanism.

Consequently, the Office Action's assertion applies hindsight and then assumes obviousness in the combination. In fact, the combination of Graef and Lynch would teach away from Applicants' claims 1 and 6.

For example, Graef describes an automated banking machine where each sheet dispensing mechanism includes a friction picking member. Lynch describes a pick mechanism that may be either a vacuum type or friction type pick mechanism. Therefore, a person of ordinary skill in the art, upon reading Graef and Lynch, would construct a self service terminal with one type of picking mechanism. Applicants' claims, on the other hand, recite a self service terminal having both kinds of picking mechanisms in a single self-service terminal - namely, both a vacuum pick mechanism and a friction pick mechanism.

Thus, Applicants' attorney submits that independent claims 1 and 6 are allowable over Graef in view of Lynch. Further, dependent claims 2-5 and 7-10 are submitted to be allowable over Graef in view of Lynch in the same manner, because they are dependent on independent claims 1, and 6, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5 and 7-10 recite additional novel elements not shown by Graef in view of Lynch.

3. The rejection of claims 4-5 and 9-10 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef and Lynch

Dependent claims 4-5 and 9-10 are submitted to be allowable over Graef and Lynch in the same manner as independent claims 1, and 6, respectively, because of their dependency. In addition, dependent claims 4-5 and 9-10 recite additional novel elements not shown by Graef in view of Lynch.

4. The rejection of claim 11 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef, Lynch and Drescher

Applicants' independent claim 11 recites a self-service terminal comprising means defining a media dispense path; and a plurality of separate and removable media modules, at least one of the separate and removable media modules including a plurality of separate media containers and each media container having a lower face and a separate friction pick mechanism adjacent the media container's lower face for picking media from the media container and transferring the picked media to the media dispense path.

Neither Graef nor Lynch teach or suggest a media module including a plurality of separate media containers, wherein each media container has a lower face and a separate friction pick mechanism adjacent the media container's lower face for picking media from the media container and transferring the picked media to the media dispense path.

Moreover, as noted above, the storage areas 100, 102, 104 and 106 of Drescher are not separate media containers within a media module, as recited in Applicants' claims. Because the storage areas 100, 102, 104 and 106 of Drescher are not separate containers, they do not have lower faces adjacent an associated separate pick mechanism. Instead, all of the storage areas 100, 102, 104 and 106 of Drescher share a common canister delivery transport 126, which is placed above the storage areas 100, 102, 104 and 106.

### III. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.



Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

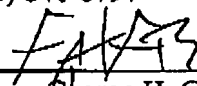
Respectfully submitted,

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